

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION
Case Type: Special Administration

In the Matter of:

Court File No. 10-PR-16-46

Estate of Prince Rogers Nelson,

Decedent,

**NOTICE OF MOTION AND MOTION RE:
ENTERTAINMENT INDUSTRY
EXPERTS**

and

Tyka Nelson,

Petitioner.

The Special Administrator hereby moves the Court for authorization to negotiate with, and potentially employ, entertainment industry experts to advise and assist the Special Administrator in the management and preservation of the wide-ranging intellectual property of the Estate, and to perform acts of administration on behalf of the Special Administrator and the Estate. While Minn. Stat. § 524.3-715(21) extends authority to the Special Administrator to make such contractual commitments, the unique nature of the Estate and the limited duration of the Special Administration counsel in favor of seeking the Court's endorsement. With the Court's approval, the Special Administrator would intend to negotiate with and potentially employ the experts identified in the accompanying Affidavit of Craig N. Ordal on terms and conditions that the Special Administrator determines to be reasonable and beneficial to the Estate under all of the circumstances.

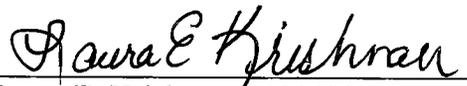
Furthermore, due to the confidential nature of the business negotiations underway, the Special Administrator is filing the Ordal Affidavit under seal, and seeks the Court's approval of

that sealed filing given the need for confidentiality in the negotiations, the ongoing considerations in favor of protecting the business interests of this Estate, the potential harm to the Estate from disclosure, and the minimal, if any, right of the public to this type of business information in a civil probate proceeding.

For the Court's information, the Special Administrator has briefed counsel to the potential beneficiaries as to the identity of the entertainment industry experts under consideration, and their business proposals.

Respectfully submitted,

Dated: June 2nd, 2016


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